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September 8, 2014

Honorable Jacqueline S. Corley
United States District Court
Northern District of California
450 Golden Gate Avenue, Dept. F
San Francisco, CA 94111

Re: Lisa Guenther (WD George Bolton), et al. v. Air & Liquid Systems, et al.

Northern District of California Case No. 12-cv-00723-CRB (JSC)

Our Client: Crane Co.

Dear Judge Corley,

We respectfully request that the Court excuse Crane Co.'s corporate representative from physically appearing at the October 3, 2014, settlement conference in the above-referenced matter. Counsel will be physically present with full settlement authority, and Crane Co.'s representative will be available by phone at all times during the conference.

Crane Co.'s corporate representatives and corporate headquarters are located on the east coast, nearly 3,000 miles away. Travelling across the country to attend this settlement conference in person will create significant costs, both in time and money. Crane Co. is a party to thousands of cases throughout the country, exacerbating these costs. As the client's physical presence at the settlement conference will not likely benefit Ms. Guenther or effect the settlement process, we ask the court excuse the corporate representative's physical presence to avoid undue costs.

As a party to numerous asbestos lawsuits throughout the country, Crane Co. has resolved a vast majority of its cases out of court and without the in-person involvement of a corporate representative. K&L Gates, national toxic tort counsel for Crane Co., resolves Crane Co. cases on a nearly daily basis throughout the country. K&L Gates has resolved hundreds of Crane Co. cases without the need for corporate representatives to physically attend the settlement conferences. Crane Co., K&L Gates attorneys, and the Weitz & Luxenberg firm are all seasoned players in asbestos litigation. Having a corporate representative fly across the country for a face to face conference is unlikely to influence the outcome in any material way.

Again, Crane Co.'s counsel will be physically present at the settlement conference with full settlement authority. In addition, Crane Co.'s corporate representative will be immediately available by telephone throughout the conference.

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Per the courts August 5, 2014 order, we have written to all counsel of record to meet and confer regarding our request. Over a week ago, in a letter dated August 28, 2014, I invited counsel to contact me directly with any questions, concerns, or objections to this Court excusing our client's physical presence at the settlement conference. Only Plaintiffs objected, providing no reason other than the representation that Plaintiff Lisa Guenther will be appearing in person.

For the reasons stated, Crane Co. respectfully requests that the Court excuse Crane Co.'s corporate representative from physically attending the October 3, 2014 settlement conference.

Regards,



Peter E. Soskin

cc: All Counsel

Dated: September 16, 2014

